

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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Plaintiff(s),

-against-

**JOINT PROPOSED
CIVIL CASE MANAGEMENT PLAN**

Civ. () (VMS)

Defendant(s).

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The parties/counsel who conferred in drafting this joint proposed case management plan:

For Plaintiff(s):

For Defendant(s):

- A. Do the parties request referral to the Court's ADR program? Yes: No:
- B. Do the parties consent to proceed before a Magistrate Judge pursuant to 28 U.S.C. § 636(c)?
Yes: If yes, fill out the AO 85 Notice, Consent and Reference of a Civil Action to a Magistrate Judge Form and file it on ECF. <https://www.uscourts.gov/forms/civil-forms/notice-consent-and-reference-civil-action-magistrate-judge>.
No: If no, do not indicate which party declines consent.
- C. The parties may wish to engage in settlement discussions.
If so, Plaintiff(s) will serve demand by . Defendant(s) will respond by .
- D. Defendant(s) will answer or otherwise respond to complaint by , if not yet done.
The parties will serve Rule 26(a)(1) initial disclosures by , if not yet done.
The parties will serve initial document requests and interrogatories on or before .
Any joinder and/or amendments of the pleadings must be made by .
The parties will complete fact discovery by .
If the parties perform expert discovery, they will serve initial disclosures by ;
initial expert reports by ; and rebuttal expert reports on or before .
All discovery, including expert depositions, will be completed by , and the parties
will file a joint letter certifying the close of all discovery by this same date.
- Other considerations the parties wish to bring to the Court's attention, such as the need for
electronic discovery or confidentiality order: